

# **EXHIBIT C**

IN THE UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF DELAWARE

THOMAS A. EAMES, ROBERTA L. EAMES )  
and TAMMY EAMES, on behalf of )  
themselves and all others )  
similarly situated, )  
Plaintiffs, ) C.A. No. 04-CV-1324KAJ  
v. )  
NATIONWIDE MUTUAL INSURANCE )  
COMPANY, )  
Defendant. )

**EAMES PLAINTIFFS' FIRST SET OF  
REQUESTS FOR PRODUCTION OF DOCUMENTS**

Pursuant to Federal Rule of Civil Procedure 34, plaintiffs Thomas A. Eames, Roberta L. Eames and Tammy Eames (collectively, the "Eames plaintiffs") request that defendant Nationwide Mutual Insurance Company produce for examination and copying at the office of the Eames plaintiffs' attorneys, and in the time prescribed by that Rule, the following items:

**Definitions**

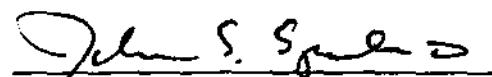
1. References to "you", "your" or "Nationwide" are to the defendant Nationwide Mutual Insurance Company.
2. The term "PIP" refers to Personal Injury Protection or other first party "no fault" insurance benefits for medical expenses, lost earnings or funeral expenses provided or to be provided under policies of automobile insurance.
3. The term "document" shall have the broadest meaning permissible under the Federal Rules of Civil Procedure, and shall include (without limitation) documents created or stored by electronic means.

Documents to be Produced

1. All documents that refer to or characterize limits of liability for PIP coverage as "full."
2. All documents that refer or relate to the characterization of limits of liability for PIP coverage as "full."
3. All documents or other recorded material that refer or relate to the training, instruction or education of Nationwide's employees or agents (including without limitation insurance agents) with respect to the characterization of PIP limits as "full."

Respectfully submitted,

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Attorneys for plaintiffs Thomas A. Eames,  
Roberta L. Eames and Tammy Eames (on  
behalf of themselves and all others similarly  
situated)

April 7, 2005